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F#. 2022R00048

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

WILLIE FORD,  
also known as “Willow” and “Mula,”  
Defendant.

**SUBMITTED UNDER SEAL**

**AFFIDAVIT IN SUPPORT OF AN  
ARREST WARRANT**

(T. 18, U.S.C., §§ 1951 and 2)

22-MJ-179

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EASTERN DISTRICT OF NEW YORK, SS:

MARK SHACKEL, being duly sworn, deposes and states that he is a Task Force Officer with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

On or about December 3, 2021, within the Eastern District of New York and elsewhere, the defendant WILLIE FORD, also known as “Willow” and “Mula,” together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of prostitution proceeds from Jane Doe, an individual whose identity is known to the Affiant.

(Title 18, United States Code, Sections 1951 and 2)

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to obtain an arrest warrant, I have not described all the relevant facts and circumstances of which I am aware.

1. I have been a law enforcement officer with the New York City Police Department (“NYPD”) for more than 12 years, and, since October 2021, I have been designated a Task Force Officer with the FBI. I am currently assigned to the Child Exploitation and Human Trafficking Task Force, where I am responsible for conducting and assisting in investigations involving sex trafficking, among other crimes. The information in this Complaint comes from my personal involvement in the investigation and review of records of the FBI, NYPD and other government agencies, including NYPD body camera worn video footage, interviews with the victim and conversations with other law enforcement officers. Unless specifically indicated, all conversations and statements described in this affidavit are related in sum and substance and in part only.

2. Jane Doe has advised, in substance and in part:

a. Since at least in or around the Fall of 2021, Jane Doe has been engaged in prostitution, working for the defendant WILLIE FORD.

b. FORD collected the proceeds earned by Jane Doe after she engaged in commercial sex acts with customers and regularly threatened Jane Doe to obtain additional money from her.

c. As part of the prostitution business, Jane Doe performed sex work in New York and New Jersey and had advertisements for commercial sex posted on websites on the internet, including MegaPersonals.

d. On or about December 3, 2021, the defendant WILLIE FORD threatened to harm her and then took, without her consent, approximately \$200 from her

person. The \$200 that FORD stole from Jane Doe was money that she had earned from a commercial sex act.<sup>2</sup>

3. On or about December 3, 2021, at approximately 8:56 a.m., Jane Doe called 911, reporting that the defendant WILLIE FORD stole money from her inside the lobby of the Galaxy Motel (the “Motel”), located at 860 Pennsylvania Avenue, in Brooklyn, New York. Responding police officers arrived at the Motel at approximately 9:06 a.m., at which time Jane Doe informed them, in substance and in part, and as captured on body camera surveillance, that FORD had informed her that he would “break your face” if she did not give him \$200, and that he subsequently took \$200 from her and fled in a gray car.

4. Jane Doe provided law enforcement officers a screenshot of text messages with an individual stored in her cellular telephone as “Mula,” who Jane Doe identified as FORD, in which FORD texted her, among other things, “I’ll break ya face on god u fuckin crazy.”

5. On or about December 22, 2021, the defendant WILLIE FORD was arrested on state charges in connection with the robbery of Jane Doe on December 3, 2021. At the time of his arrest, law enforcement officers, following a search incident to FORD’s arrest, seized a phone from FORD (the “FORD Phone”) and obtained and executed a judicially-authorized search warrant on the FORD Phone.

6. Among the items recovered during the search of the FORD Phone were text message correspondence between FORD, using the FORD phone, and Jane Doe, using

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<sup>2</sup> Jane Doe has prior convictions for menacing, criminal contempt, assault and obstructing governmental administration. Information provided by Jane Doe to law enforcement officers has been corroborated in significant part by information from reports and physical evidence, among other things.

the same telephone number Jane Doe used to call 911 (the “Jane Doe Phone”), revealing that in the lead-up to the robbery on December 3, 2021, FORD texted Jane Doe about her prostitution work, including his demand for money from Jane Doe.

7. For example, on December 2, 2021, at approximately 1:18 p.m., the defendant WILLIE FORD texted Jane Doe that she should not call him “until u got bread,” i.e., money. Later in the conversation, at approximately 4:36 p.m., FORD texted Jane Doe that, “If I ain’t a pimp name one who knocks more hoes then me [laughing emoji].” Then, at approximately 4:39 p.m., FORD texted Jane Doe, “Nah u grimey n everytime I post u . . . u do dis I’m Gucci n leaving to go to Texas to run it up.” Based on my training and experience and participation in this investigation, there is probable cause to believe that when FORD wrote “post u,” he was referring to placing ads for Jane Doe to obtain commercial sex work.

8. Text message correspondence from the FORD Phone further reveals that the defendant WILLIE FORD threatened Jane Doe on several occasions in the lead-up to the December 3, 2021 robbery. For example, on December 2, 2021, at approximately 8:11 p.m., during an argument between Jane Doe and FORD, FORD texted Jane Doe, “Now I’m a break ya shit on everything,” and “U kno I’m a catch u watch when,” to which Jane Doe responded, “The more u threatene me I’m gonna stay away.” However, Jane Doe subsequently texted FORD, “If I get money for room u gonna post me,” to which FORD responded, “I need a band [i.e., \$1000] for me to talk wit u again.” Based on my training and experience and participation in this investigation, there is probable cause to believe that when Jane Doe wrote, “post me,” she was referring to FORD acting as a pimp for Jane Doe by, among other things, posting ads for Jane Doe on the internet to obtain commercial sex work. As another example, at approximately 8:33 p.m., FORD instructed Jane Doe, “if you not hoeing up on a

whole different level then stay away Bc I got a good thing goin n everyone is on they shit n a good way," and then, at 8:37 p.m., "Ok so stay off my line Bc dis ain't no back n forth . . . .  
ITS DO WAT I SAY OR STAY AWAY N IF U COME BACK N PLAY U GONNA GET YA HEAD BUSTED N DAT GOES FOR EVERYONE."

9. Text message correspondence from the FORD Phone also reveals that on the morning of the December 3, 2021 robbery, the defendant WILLIE FORD was texting Jane Doe repeatedly in a threatening manner. At approximately 6:32 a.m. that morning, FORD texted Jane Doe, "R u goin to make money????" Jane Doe responded, "Ok imma have him Uber me to galaxy." Based on my training, experience and participation in this investigation, when Jane Doe mentioned "galaxy," she meant the Galaxy Motel, where FORD robbed Jane Doe approximately two hours later. At 6:36 a.m., FORD texted Jane Doe, "if u want da respect u deserve out there get out there HOE UP [emoji] N EMBARRASS DA OTHER HOES BY RUNNING IT UP [emojis]." At 7:53 a.m., FORD and Jane Doe exchanged the following messages:

FORD Phone: U on ya way back yet??? (7:53 a.m.)

Jane Doe Phone: Yessss (8:00 a.m.)

FORD Phone: Ok I'm here (8:07 a.m.)

Jane Doe Phone: U wanna be rude ok (8:10 a.m.)

FORD Phone: I'll break ya face on god u fuckin crazy (8:10 a.m.)

...

FORD Phone: So if u not here n da next 15 minutes [emoji] bc it's not goin b games over here . . . do dat wit another household [peace sign emoji] (8:25 a.m.)

...

Jane Doe Phone: I'm coming so shut up (8:28 a.m.)

FORD Phone: Ok I'm on side of hotel (8:28 a.m.)

Based on my training, experience and participation in this investigation, there is probable cause to believe that in this conversation, FORD was instructing Jane Doe to return to the Motel shortly before the robbery.

10. Finally, text message correspondence reveals that, following Jane Doe's report of the December 3, 2021 robbery to law enforcement officers, the defendant WILLIE FORD, using the FORD Phone, threatened Jane Doe because she had spoken with law enforcement. Specifically, FORD, using the Ford Phone, texted Jane Doe, "U talk to police," and, after she responded that FORD "Shoulda never crossed me," FORD texted Jane Doe, among other things, "U a worldwide RAT [rat emoji] BYE [peace sign emoji]." Then, at approximately 12:15 p.m. on the same day, FORD texted Jane Doe, "Watch n I told ppl near ya sis n showed them u a snitch [emoji]," and then, "U done." Finally, at approximately 12:20 p.m. on the same day, FORD texted Jane Doe, "Silly I kno blood bitch who want ya head n I'm a lead them to u." Based on my training, experience and participation in this investigation, there is probable cause to believe that when FORD wrote, "I know blood bitch," he meant that he knew someone who was a member of the Bloods street gang and threatened Jane Doe that he was going to lead said Bloods member to Jane Doe so the Bloods member could physically hurt Jane Doe.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued so that the defendant WILLIE FORD may be dealt with according to law.

I further request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest

warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence and change patterns of behavior.



MARK SHACKEL  
Task Force Officer  
Federal Bureau of Investigation

Sworn to before me this  
10 day of February, 2022  
[Redacted]

THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK